

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF PUERTO RICO

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U.S. DISTRICT COURT  
SAN JUAN, PR

1  
2 MICHAEL PEREZ ORTEGA, et al.,  
3 Plaintiffs,  
4 v.  
5 AUTORIDAD DE CARRETERAS,  
6 et al.,  
7 Defendants.

CIVIL NO. 98-2379 (RLA)

**ORDER SETTING INITIAL SCHEDULING CONFERENCE  
AND INSTRUCTING PARTIES TO FILE  
JOINT INITIAL SCHEDULING MEMORANDUM**

11 An INITIAL SCHEDULING CONFERENCE is hereby scheduled before the  
12 undersigned<sup>1</sup> for **April 25, 2000; at 2:30 p.m.**

13 The parties shall file on or before April 14, 2000 a JOINT  
14 INITIAL SCHEDULING MEMORANDUM with the following information:

- (2)
- 15 1. Factual version of the case.
  - 16 2. Applicable legal theories.
  - 17 3. List of fact witnesses with a concise one sentence  
18 reference to the expected testimony of each.
  - 19 4. List of expert witness(es) with reference to respective  
20 field(s) of expertise.

21 The parties are admonished that additional witnesses, whether  
22 fact or expert, will not be permitted unless allowed by the Court  
23 upon good cause shown.  
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25  
26 <sup>1</sup> The parties shall contact the undersigned's chambers to  
verify where the conference will be held.

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1 The written reports for the expert witnesses shall include:

2 "[A] complete statement of all opinions to be  
3 expressed and the basis and reasons therefor;  
4 the data or other information considered by the  
5 witness in forming the opinions; any exhibits  
6 to be used as a summary of or support for the  
7 opinions; the qualifications of the witness,  
8 including a list of all publications authored  
9 by the witness within the preceding ten years;  
10 the compensation to be paid for the study and  
11 testimony; and a listing of any other cases in  
12 which the witness has testified as an expert at  
13 trial or by deposition within the preceding  
14 four years.  
15

16 Rule 26(a)(2)(B) Fed. R. Civ. P.

17 5. A list of all documentary evidence available to support  
18 the parties' respective contentions.

19 6. Itemization of all discovery to be conducted, including  
20 interrogatories,<sup>2</sup> requests for admissions, requests for production  
21 and depositions.

22 7. If a party intends to amend its pleadings, join parties,  
23 or file a third party complaint, reference must be made as to the  
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25 <sup>2</sup> Interrogatories shall be limited to no more than twenty-five  
26 (25) questions. See Rule 33(a) Fed. R. Civ. P.

specific action that it wishes to take, identifying both the parties and the relief sought.

8. For all dispositive motions the parties anticipate filing:

- a. Identify the proponent;
- b. Describe the nature and subject matter of the motion;
- c. Identify the party(ies) against whom the motion will be addressed; and
- d. The expected date for submission of the dispositive motion in accordance with the AMENDED STANDING ORDER issued on May 19, 1998 setting forth the PROCEDURE FOR FILING DISPOSITIVE MOTIONS IN CIVIL CASES ASSIGNED TO JUDGE RAYMOND L. ACOSTA.

9. The parties shall include proposed deadlines for each of the following categories of discovery:

- Deadline for parties to propound all written discovery.
- Deadline for plaintiff to identify all expert witnesses (if unknown at the time of filing the ISC memorandum).
- Deadline for conclusion of all fact witnesses depositions.
- Deadline for submission of reports of all plaintiff's expert witnesses.
- Deadline for conclusion of depositions of all of plaintiff's expert witnesses.
- Deadline for defendant to identify all expert witnesses (if unknown at the time of filing the ISC memorandum).

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1 - Deadline for submission of reports of all defendant's expert  
2 witnesses.

3 - Deadline for conclusion of depositions of all defendant's  
4 expert witnesses.

5 - Deadline for serving dispositive motions to opposing counsel.

6 10. Any other matter the parties deem appropriate.

7 Failure to comply with the terms of this Order shall result in  
8 the imposition of sanctions including but not limited to the  
9 dismissal of the complaint, entry of default and/or sanctions  
10 against counsel personally.  
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12 IT IS SO ORDERED.

13 San Juan, Puerto Rico, this 25<sup>th</sup> day of February, 2000.

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16 RAYMOND L. ACOSTA  
United States District Judge  
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